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10 Attorneys for Defendants  
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 12 Katkov and Donald P. Lofe, Jr.

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA

15 LORI WEINRIB, Individually and on  
 16 Behalf of All Others Similarly Situated,

17 Plaintiff,

18 vs.

19 THE PMI GROUP, INC., L. STEPHEN  
 20 SMITH, DAVID H. KATKOV and  
 DONALD P. LOFE, JR.,

21 Defendants.

Case No. C 08 1405 SI

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING SCHEDULING  
 AND RELATED MATTERS**

22 KIMBERLY D. HOLT, Individually and  
 23 on Behalf of All Others Similarly Situated,

24 Plaintiff,

25 vs.

26 THE PMI GROUP, INC., L. STEPHEN  
 27 SMITH, DAVID H. KATKOV and  
 DONALD P. LOFE, JR.,

28 Defendants.

Case No. C 08 1806 SC

STIPULATION AND [PROPOSED] ORDER  
 CASE NO. C 08 1405 SI

Pursuant to Federal Rules of Civil Procedure 16 and 42, Civil L.R. 23-1(b), and the Manual for Complex Litigation, Fourth §§ 11.12, 11.21 and 31 (2004), the parties stipulate, and the Court hereby orders, as follows:

CONSOLIDATION OF RELATED CASES AND ALL FUTURE RELATED CASES

1. All related actions that are currently or subsequently filed in, or transferred to, this District shall be consolidated into this action for pretrial purposes. This Order shall apply to every such related action, absent order of the Court. A party that objects to such consolidation, or to any other provision of this Order, must file an application for relief from this Order within thirty (30) days after the date on which a copy of the order is mailed to the party's counsel.

2. The following two related actions have been filed in this District as of this date:

*Lori Weinrib v. The PMI Group, Inc. et al.*, Case No. C-08-1405-SI.

*Kimberly D. Holt v. The PMI Group, Inc. et al.*, Case No. C-08-1806-SC.

3. This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, for good cause shown.

MASTER DOCKET AND CAPTION

4. The docket in Civil Action No. C-08-1405 shall constitute the Master Docket for this action.

5. Every pleading in this proceeding shall bear the following caption:

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE THE PMI GROUP, INC.  
SECURITIES LITIGATION

) Case No. C-08-1405-SI

) CLASS ACTION

) THIS DOCUMENT RELATES TO:

6. The file in Civil Action No. C-08-1405 shall constitute a Master File for any and all actions consolidated into this action. When a pleading is intended to be applicable to all actions to which this Order is applicable, the phrase "All Actions" shall appear immediately after the words "This Document Relates To:" in the caption set out above. When a pleading is

STIPULATION AND [PROPOSED] ORDER  
CASE NO. C 08 1405 SI

1 intended to be applicable only to some, but not all, of such actions, the document shall list,  
2 immediately after the phrase "This Document Relates To:", the docket number for each  
3 individual action to which the document applies, along with the last name of the first-listed  
4 plaintiff in any such action.

5 7. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12  
6 whenever a case that should be consolidated into this action is filed in, or transferred to, this  
7 District. If the Court determines that the case is related, the clerk shall:

- 8 a. Place a copy of this Order in the separate file for such action;  
9 b. Serve on plaintiff's counsel in the new case a copy of this Order;  
10 c. Direct that this Order be served upon any new defendant(s) in the new  
11 case; and  
12 d. Make the appropriate entry in the Master Docket.

13 LEAD PLAINTIFF'S COUNSEL

14 8. After the Court has designated a Lead Plaintiff and Lead Plaintiff's Counsel,  
15 pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v), Lead Plaintiff's Counsel shall have authority to speak  
16 for, and enter into agreements on behalf of, plaintiffs in all matters regarding pretrial procedures,  
17 discovery, and settlement negotiations. Lead Plaintiff's Counsel shall manage the prosecution of  
18 this litigation to avoid duplicative or unproductive activities. Lead Plaintiff's Counsel shall be  
19 responsible for coordination of all activities and appearances on behalf of plaintiffs and for  
20 dissemination of notices and orders. Lead Plaintiff's Counsel shall maintain a master service list  
21 of all parties and counsel.

22 9. Defendants' counsel may rely upon agreements made with Lead Plaintiff's  
23 Counsel. Such agreements shall be binding on all plaintiffs. Service on Lead Plaintiff's Counsel  
24 shall constitute service on all plaintiffs.

25 PLEADINGS AND MOTIONS

26 10. Defendants are not required to respond to the complaint in this action or any action  
27 consolidated into this action, other than a consolidated complaint or a complaint designated as the  
28 operative complaint by Lead Plaintiff's Counsel. Defendants have authorized their respective

1 counsel to accept service of the initial complaints, but acceptance of service will not constitute a  
2 waiver of any defenses.

3 11. Lead Plaintiff shall file a consolidated complaint within sixty (60) days of the  
4 entry of an order appointing Lead Plaintiff and Lead Counsel in this Consolidated Action, unless  
5 otherwise agreed upon by the parties. The consolidated complaint shall supersede all existing  
6 complaints filed in this Consolidated Action.

7 12. Defendants shall respond to the consolidated complaint within forty-five (45) days  
8 after service (or, in the event that Lead Plaintiff's Counsel designates an existing complaint as the  
9 operative complaint, within forty-five (45) days after service of written notice of such  
10 designation), unless otherwise agreed upon by the parties. If defendants file any motions directed  
11 at the operative complaint, the opposition brief shall be filed within forty-five (45) days of that  
12 motion, with the reply brief filed thirty (30) days thereafter, unless otherwise agreed upon by the  
13 parties.

14 13. Counsel for the parties shall notify their clients of their document preservation  
15 obligations pursuant to federal securities laws and the Local Rules.

16  
17 O'MELVENY & MYERS LLP

18  
19 Dated: April 7, 2008

20 By: /s/ Meredith N. Landy  
Meredith N. Landy

21 Attorneys for Defendants  
22 The PMI Group, Inc., L. Stephen Smith, David  
23 H. Katkov and Donald P. Lofe, Jr.  
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COUGHLIN STOIA GELLER RUDMAN &  
ROBBINS LLP

Dated: April 7, 2008

By: /s/ Shawn A. Williams  
Shawn A. Williams

Attorneys for Plaintiff  
Lori Weinrib, Individually and on Behalf of  
All Others Similarly Situated

SCHIFFRIN BARROWAY TOPAZ &  
KESSLER, LLP

Dated: April 7, 2008

By: /s/ Alan R. Plutzik  
Alan R. Plutzik

Attorneys for Plaintiff  
Kimberly D. Holt, Individually and on Behalf  
of All Others Similarly Situated

I, Meredith N. Landy, am the ECF User whose ID and password are being used to file this  
Stipulation and [Proposed] Order Regarding Scheduling and Related Matters. In compliance with  
General Order 45, X.B., I hereby attest that Shawn A. Williams and Alan R. Plutzik have  
concurred in this filing.

By: /s/ Meredith N. Landy  
Meredith N. Landy

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April \_\_\_\_, 2008



The Honorable Susan Illston  
United States District Judge

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